## **BEFORE THE**

## UNITED STATES DEPARTMENT OF TRANSPORTATION RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION

DOCKET NO. FMCSA-02-11650 (HM-232A)

HAZARDOUSMATERIALSSECURITYREQUIREMENTISFORMOTORCARRIERSTRANSFORTINGHAZARDOUSMATERIALS

**COMMENTS OF** 

THE DOW CHEMICAL COMPANY

WEDNESDAY, SEPTEMBER 11, 2002

## **INTRODUCTION**

Dowgpreitestreppotuniyteenin reuseoschalorwih RSP Aardhe FMCS Aardeprovid the Glowing preificomments dreu esterprovent the ANPRM **ISSUES** 

1. What are the state of information and communications technology development and the current level of adoption of state-of-the-art systems by the toping finished middle died in der Resident October 1814 Comittee in Delegation of the Committee in Delegation of the Delegation of the

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The time was broad to spekillusive affection with the control of t

2. What is the effectiveness of different types of physical security measures?

The effectiveness of physical security measures varies depending on the method chosen.

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- Kingribdskritiggarbdsmitoffinwheilidis-Destreftoffales-Acestodevickeyispiddemandiomhinionlidischmitwithendweilnewell
- Air brake locks Deters theft by making release of brakes impossible.
- Cable seals Deters easy access but can be cut.
- CPS Deies Prointe in istell Printipaten and patalik Matrice at the ispandation of the development of the d
- Tata Aces Corts Such vertali advice to percentile Anterioristic principali y discussioni de la contra del contra de la contra del la contra de la contra del la cont
- Fast-Appropriate the metallic and the anidate anidat
- 3. What is the overall security of safe havens for temporary storage during transportation, including suggestions for improving security at safe havens or
- 4. What a through the design of the profession o

SECURITY ITEM	DESCRIPTION	IMPACT	COST
Tiado:AcessControlbyMagTec	Sutabvatción exchtallerluicillátopalischile	DetesthefiCanemovetailerwithtowtrusk	Approximately\$400perunit
TiadorAccessControlbyBaseEng	Sigilah Mahntiyakan andulu	Detesthefi Canemovetailer with tow truck	Approximately\$400perunit
Satellite Tracking on Tractors	Sønsk (alomanningevelds)lanains	Noradaly Oktoré Anticaket Of Aprilats	Rutich20holpanjlsnessee
Satellite Tracking Upgrades	Adlgaribiti(Akonnsytrisficanje	Paiditides promininal de la generation de aqualitica de la	\$350\$30penetroliplus verte:
SteringColumnLockingDevices	Resiliste Didato disposización Per adjuste	Dakteuringhombelgrock Astablishe äterte	Approximately\$15perunit
AnithelDexicsforUntendedliales	K <b>alibidgilşalivalikallasılılığı</b> ğı	Tike Asipahusha agusukik sipilke Garbinik kasikus kun kine k	Up to \$200 per unit.

Global Positioning Devices	Apritsigalezobycigst extransis	Standard Addition of the Standard of the Stand	Approximately\$400perunit
Mechanical Sealing of Cargo Tanks	Ajakampinatikalen alkokalekalikatika	Adaliadaja vataka atmirid Maliatania principa da cary	Call-Sakarbayto\$lpased
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AdvancedCargoSealingDevices	Gacon fish Pac Sate Datos Sten ficamete	Dahaili ing sakabah na ing kalisi kalampin atapah na tapah na tapa	Appoximately\$500peunit
	Charles Charles Spring Spring Charles	13. The state of t	1 ppoureasy cooperate

- 5. Ales politica allega interior in the control of the control of
- 6. Are there measures or incentives that may be appropriate to consider in promoting technology development and adoption in conjunction with or promoting technology development and adoption in conjunction with or promoting the promoting of the conjunction of t
  - Research and development of improved technology for sealing cargo containers.
  - Cargocontainermodificationsifiequired by a Federalagency. The Federalagency requirements desirable to ensure consistency and uniformity.
  - Downput flux ad it to add given in the control of the control of
  - Dyspotifiuszalitteáltófainnotingsenszentpontádat kedenizágoztádakezhadatlátbálászobásznalósábanigfattozáó
  - Dowsupportsfurthenesearchintotheuseof 'smartcards' and readerstoen hance verification and inspection of hazmatshipments.
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  - Downpotflersaltebehbwesterbisserindstraltspossasserpeantweftenetosonbudksandissestadaserinefiediseanthramitantis
  - Dowsprotsfuthereeard into the viability of elf-scaling technologies to prevention migrated emical eleves should be agreed that the description of the control of the control
  - Dows upports fürthen esearch into herotere figeration systems can play in mitigating achemical de asserber acargo containe habeen beached.
- 7. Should specific physical security measures be limited to certain highly hazardous materials and, if so, which highly hazardous materials warrant specific security measures to the control of the cont
  - IT SP vin besk (Pst ingligent dates and red standard elegates in called the grain tests and indicated the collection of the collection o
  - Farmales Entries Nurtue le la locate de la company de la
  - All Other Materials = Numbered seals only.

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Respectfully submitted,

Colin K. Buell

September 11, 2002 Page 4

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